



Stewart

THE CITY OF SAN DIEGO

May 7, 2015

CERTIFIED MAIL-#7014-1200-0001-5680-7949
PIN: CW-255222:wchiu

SAN DIEGO REGIONAL
WATER QUALITY
CONTROL BOARD
2015 MAY 13 AM 10 04

Mr. David Barker
California Regional Water Quality Control Board
San Diego Region
2375 Northside Drive, Suite 100
San Diego, CA 92108-2700

SUBJECT: RESPONSE TO NOTICE OF VIOLATION NO. R9-2015-0031
PIN: CW-255222: wchiu

Dear Mr. Barker:

This letter is in response to the **Notice of Violation (NOV) NO. R9-2015-0031** issued to the City of San Diego (City) on February 20, 2015, for violations of Order No. R9-2007-0001, National Pollutant Discharge Elimination System (NPDES) General Permit No CAS0108758, *Waste Discharge Requirements for Discharges of Urban Runoff from the Municipal Separate Storm Sewer Systems (MS4s) Draining the Watersheds of the County of San Diego, the Incorporated Cities of San Diego County, the San Diego Unified Port District, and the San Diego County Regional Airport Authority* (Permit), for failure to require implementation of designated minimum best management practices (BMPs) at construction sites within the City's jurisdiction, and failure to implement an escalating enforcement process to reduce, eliminate, and prevent recurrences of noncompliance at construction sites where deficiencies are noted.

BACKGROUND

The San Diego Water Board issued NOV R9-2011-0027 on January 27, 2011 for deficiencies in the City's construction management program which led to construction site discharges. On March 7, 2014 NOV R9-2014-0024 was issued by the State Water Board and subsequently an audit was conducted of the City's construction management program on April 8-10, 2014. On July 15, 2014, the State Water Board issued an Audit Findings Report recommending corrective actions. On September 30, 2014, the City sent a letter to the State Water Board with a table describing the City's response to each finding, planned corrective measures, and estimated time to implement the corrective measures. On February 20, 2015 the State Water Board issued NOV R9-2015-0031 for continued deficiencies within the City's construction management program.



SUMMARY OF ALLEGED VIOLATIONS

1. Failure to Comply with Discharge Prohibitions of Municipal Storm Water Permit; failed to implement, or require the implementation of designated minimum best management practices (BMPs) led to sediment laden discharge
 - a. **Observation:** Inspectors failed to implement, or require the implementation of designated minimum best management practices (BMPs) lead to sediment laden discharge.
 - b. **Corrective Measures:** In an effort to improve implementation of construction BMPs, the City has begun a self-assessment routine. Since the re-establishment of a Construction Storm Water Section (CSW) within the Field Engineering Division of the Public Works Department (PW) in March 2014, staff from this section has been tasked with the random inspection of CIP and Engineering Permit projects in construction. These internal inspection reports provide thorough, detailed and location specific recommendations regarding the implementation of BMPs and includes photo documentation. These reports are shared with the Resident Engineer (RE) for immediate follow-up. It is expected that each RE visit the site to perform an inspection with the contractor (CSW staff are often invited) and identify these same issues and provide a copy of the BMP Notice to the contractor. In addition, at the request of the REs, CSW staff provides inspection and consultation checks and rechecks to ensure the sites are in compliance. This self-assessment routine has led to an increase in Stop Work Notices issued by the City. Since March 2014, a total of seven (7) Stop Work Notices were issued by City Field Engineering staff. To further improve this assessment routine and improve accountability, CSW staff will immediately alert the RE's supervisor and Senior Engineer of the non-compliance issues to gain additional support. These notifications will be used to support disciplinary actions for staff as well as corrective actions for CIP Contractors. A sample inspection report is provided as Exhibit A.

In addition, the Development Services Department (DSD) Inspection Services management will continue to monitor staff's performance and provide additional training to correct inconsistencies. Since July of 2014 the DSD Inspection Services section has added an additional ten (10) inspectors to ensure that staff are managing workload and can provide more thorough storm-water inspections. In addition the section will hire three (3) additional inspectors and one supervisor dedicated to storm water inspections that will follow-up on sites which are not in compliance with required construction BMPs. Also the dedicated inspectors will perform storm-water inspections on multi-phased developments, high- priority projects during rainy season, and developments near sensitive watershed areas. This will increase efficiency and provide a better means to escalate enforcement while removing the reliance of several inspectors managing uncooperative developers. Besides monitoring High and Medium priority projects, these dedicated DSD Storm Water Inspectors will also be tasked with developing future in-house training and making procedural changes to ensure storm water compliance is achieved for all sites issued

construction permits. Until such staff are on-board, DSD staff has implemented a procedure to improve coordination between trade inspectors and enforcement of BMPs, by designating one inspector to take the lead on projects with failed Storm Water Inspections. Lastly, the City desires to improve accountability and transparency of the inspection process by developing an interface with Regional Water Board staff through monthly joint site inspections during the rainy season. By performing inspections jointly, it is expected that the inspectors develop a better understanding of minimum BMPs required by the MS4 and Construction General Permits.

2. Failure to Identify Inadequate Implementation of Designated Minimum BMPs at Construction Sites

- a. **Observation:** The City's construction storm water inspectors consistently fail to identify inadequate implementation of the designated minimum BMPs required by the City's ordinances and the Order for construction projects.
- b. **Corrective Measure:** As provided in the response to the Audit Findings Report, the City has solicited proposals from subject matter experts in the Construction Storm Water industry and has selected a consultant to provide the necessary training/guidance to inspection staff in PW and DSD, including Code Enforcement (CE), to evaluate a construction site for adequacy of BMPs. The Scope of Work used to solicit proposals is included in Exhibit B. It is anticipated that this intensive 8-hour training be completed by June 1, 2015. This training is planned to be video-taped for training of new staff and as an annual refresher for existing staff. It is proposed to post the video-tape of the training on the ThinkBlue.org and the City's Storm Water websites and promote it as a resource and an educational item for the public and contracting communities. In addition, PW has initiated monthly storm water eNewsletters and is proposing quarterly tailgates with staff to highlight projects which have successfully implemented BMPs and to provide training regarding existing and new BMP technologies. The City currently trains staff bi-annually regarding storm water regulations, BMP Inspection practices and enforcement of sites. Most recently the City updated and re-published the Clean Construction brochure and is preparing to publish a Frequent Violations pamphlet, both of which have been distributed at construction sites and at Pre-construction meetings. Annually, City inspectors from both inspection divisions meet to review storm water regulations and improve coordination amongst staff. For CIP projects, PW is exploring stricter storm water training requirements for CIP contractors by revamping the prequalification process to make storm water requirements a component of doing business with the City. While these items will ensure contractors hired by the City have a more robust storm water background, the REs will continue to have enforcement responsibility. DSD has implemented a new process whereby all building projects that are a high or medium construction site priority will require Storm Water preconstruction meetings. The preconstruction meeting will be an opportunity for the inspectors to relay to the contractor BMP requirements and emphasize the importance of compliance, plus the consequences of violations.

3. Failure to Implement an Escalating Enforcement Process to Require Implementation of Designated Minimum BMPs at Construction Sites
 - a. **Observation:** Inspectors fail to implement an escalating enforcement process and issue enforcement actions that achieve prompt corrective actions
 - b. **Corrective Measure:** As provided in the response to the Audit Findings Report, the City has added a level of enforcement that includes the formal issuance of a Stop Work Warning letter. These letters were issued when compliance in implementing minimum BMPs was not achieved after 2-3 BMP Notices on 2 projects. As a result of enhanced coordination between City departments, all building inspections were also halted until compliance was achieved. In an effort to further strengthen the Escalating Enforcement Process, the City has developed a strategy on the use of a tiered enforcement action structure to be used in combination with Administrative Citations and with Civil Penalties, see Exhibit C. Higher tiered violations would each be accompanied with a fine ranging from \$100-\$1000 for administrative citations and up to \$2,500 for civil penalties, respectively, per violation per day with a maximum of \$250,000.00. Violations resulting in a discharge are subject to civil penalties of up to \$10,000 per day. City staff expects to complete detailed procedures, notification to the contracting and development industry and training of staff by September 2015 and implementation for the next rainy season beginning October 2015.

**CLARIFICATION SUMMARY TO AUDIT INSPECTION REPORT, DATED
NOVEMBER – DECEMBER 2014**

II. FINDINGS

2. Hilton Garden Inn (4200 Taylor St. 92110)
 - c) All DSD inspectors have been retrained to ensure all appropriate boxes are marked when issuing a Storm Water Notice. This will also be stressed in the pending Storm Water Training to take place in May.
 - e) This finding states: “The November 18, 2014 Storm Water Notice indicated that “a verbal warning” was issued, but no violations identified or enforcement actions issued.” In this case, the inspector failed to cross out the word “verbal”. He intended to inform the contractor that a previous notice was issued. As previously stated staff will be retrained to correctly and completely fill out Storm Water Notices.
5. Northwest Village Creek (602 Euclid Ave. 92114)
 - b) & c) An explanation is required regarding the Storm Water Notice issued by a DSD Inspector on September 26, 2014 and the statement that there was no record of any subsequent enforcement action issued to the site by the City. In an effort

to increase Storm Water awareness and voluntary compliance, DSD managers instructed inspectors to reach out to contractors and owners during a project's first inspection to inform them of their Storm Water responsibilities and ensure that BMPs will be installed and maintained throughout the life of their project. The information was intended to warn our customers of potential issues that could arise at the various construction phases. In following management instruction, DSD inspectors provided contractors and owners with a copy of DSD's Storm Water Notice marked "info only" and a copy of the City's Clean Construction brochure. By writing "Info only" on the form and adding notes in our Project Tracking System, no further enforcement action was intended, but all future inspectors would be aware that the information was shared, thus enabling escalation of enforcement for those who did not heed the advice.

6. Mission Gorge Apartments (6850 Mission Gorge Road 92120)
 - a) The City recently issued a Stop Work Warning on March 24, 2015 and followed-up with a Stop Work Notice on April 7, 2015 for continued storm water BMP violations. This site is now in compliance. See photos attached in Exhibit D

III. COMMENTS AND RECOMMENDATIONS

Comment 4. "...*The City only issues enforcement actions to construction sites after the San Diego Water Board notifies a site of violations of CGP BMP requirements and the City becomes aware of the violations.*"

Response: The City respectfully disagrees with this comment. As stated in 1b above, under Summary of Alleged Violations, the City has issued a total of 7 Stop Work Notices since the City of San Diego Construction Management Program Audit on April 8-10, 2014. Of those 7 Stop Work Notices that were issued, 5 were for projects unrelated to notifications by the Water Board.

CONCLUSION

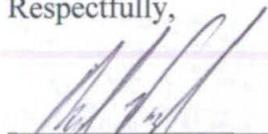
Although the Regional Board has issued two Notices of Violation to the City approximately one year apart, the City has and continues to make great improvements in its processes to ensure compliance. The City of San Diego is a very large agency and has an enormous amount of construction activity currently ongoing within its jurisdiction. During the first three months of this rainy season DSD Inspection Services group performed over 32,000 inspections and during this same period issued 195 Storm Water Correction Notices and issued eleven (11) re-inspection fees to projects that were not in compliance with construction BMPs. Besides the re-inspection fees assessed, in each of these instances, further inspections were stopped until compliance with the Storm Water Correction Notices was achieved. To meet the increased workload DSD Inspection Services has added eleven (11) new inspectors and are also requesting four (4) additional inspectors and one (1) additional supervisor for the upcoming fiscal year. PW-FED has inspected 285 projects and issued 175 corrective notices between July and December 2014, inclusive. These projects consist of large CIP and permit projects, and subdivisions, and exclude the small permit projects. The City understands the importance of compliance with these

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regulations and is making strides to conform. The City believes more time is necessary to truly assess the effectiveness of the process improvements that the City has recently developed, implemented and continues to improve on.

If you have any questions regarding the information presented in this report or wish to discuss further, please contact Akram Bassyouni at 619-446-5442 or via e-mail at ABassyouni@sandiego.gov or Julie Ballesteros at 858-573-5012 or via e-mail at BallesterosJ@sandiego.gov.

Respectfully,


Robert Vacchi, Director
Development Services Department


James Nagelvoort
Director and City Engineer
Public Works Department

JB/AB

Attachments: Exhibit A – Public Works Department, Construction Storm Water Section Inspection Form
Exhibit B – Scope of Work of Consultant/Trainer
Exhibit C – Escalating Enforcement Approaches for Development Services and Public Works Departments
Exhibit D – Mission Gorge Apartments Photos

cc:

Stephen Puetz, Chief of Staff
Scott Chadwick, Chief Operating Officer
Jaymie Bradford, Deputy Chief of Staff/Chief of Policy
Stacey LoMedico, Assistant Chief Operating Officer
David Graham, Deputy Chief Operating Officer
Mike Hansen, Policy Advisor
Kris McFadden, Director, Transportation and Storm Water Department
Marnell Gibson, Assistant Director, Public Works Department
Afsaneh Ahmadi, Deputy Director, Building Construction and Safety Division
Drew Kleis, Deputy Director, Storm Water Division
Myrna Dayton, Deputy Director, Field Engineering Division
William Barrañón, Assistant Deputy Director, Building Construction and Safety Division
Sumer Hasenin, Senior Civil Engineer, Storm Water Division



GENERAL INFORMATION

Project Name			
Address/Location	Permit Type	Non-CIP	CIP
	Permit No./DWG No.		Inspection Date
	WBS/I.O. No.		Arrival Time
			Departure Time
RE Name:	Ph:	WEATHER	INSPECTION
CSWG Inspector Name:	Ph:	Clear	Routine
Contractor Name:	Ph:	Cloudy	Follow-up
Site Contact:	Ph:	Rain	Pre Storm Event
QSD / QSP:	Ph:	Fog	During Storm Event
Company:	Ph:	Drizzle	Post Storm Event
Owner:	Ph:	Other	Other

PROJECT INFORMATION

Priority	Low	Project Size	≤5 ac	Watershed	
	Medium		>5 ac (WTAP/BIP)	Impaired Water Body/ Water Quality Sensitive Area	
	High		>5 ac, but <5 at one time (PHASED GRADING)	SWPPP Risk Level	Date
				SWPPP/WPCP (on site?)	
Project Type	<input type="checkbox"/> Residential	<input type="checkbox"/> Commercial/Industrial	<input type="checkbox"/> Institutional	<input type="checkbox"/> Mitigation	<input type="checkbox"/> Other
	<input type="checkbox"/> Grading	<input type="checkbox"/> Street Improvement	<input type="checkbox"/> Demolition	<input type="checkbox"/> Utility (Water/Sewer/Franchise)	

BMPs Measures	Inspection Finding (A/NM/NA)*	Location On Site / Comments
Erosion Control (check all that apply) *A=Adequate, NM=Needs Maintenance, NA=Not Applicable		
<input type="checkbox"/> Preservation of Exist. Vegetation/Riparian Barrier		
<input type="checkbox"/> Mulch/Hydroseed/Soil binder/BFM		
<input type="checkbox"/> Non-Vegetative Stabilization (gravel)		
<input type="checkbox"/> Geotextile/Compost Blanket/Plastic (limited)		
<input type="checkbox"/> Outlet Protection/Velocity		
<input type="checkbox"/> Slope Drains		
Sediment Control (check all that apply) *A=Adequate, NM=Needs Maintenance, NA=Not Applicable		
<input type="checkbox"/> Stabilized Constr. Ingress/Egress/Tire Wash		
<input type="checkbox"/> Stabilized Construction Roads		
<input type="checkbox"/> Silt Fences/Gravel (or Sand) Bag Berms		
<input type="checkbox"/> Dust Control/Street Sweeping/Vacuuuming		
<input type="checkbox"/> Wattles/Fiber Rolls/Compost Socks		
<input type="checkbox"/> Inlet Protection		
<input type="checkbox"/> Inactive Soil Stockpiles Covered/Protected		
<input type="checkbox"/> Check Dams		
<input type="checkbox"/> Sediment Desilting (Detention) Basin		
Run-on and Runoff Control (check all that apply) *A=Adequate, NM=Needs Maintenance, NA=Not Applicable		
<input type="checkbox"/> Earth Dikes/Swales/Lined Ditches		
<input type="checkbox"/> Water Quality Sampling, (if required)		
<input type="checkbox"/> Active Treatment System (if any)		
Site Management and Housekeeping (check all that apply) *A=Adequate, NM=Needs Maintenance, NA=Not Applicable		
<input type="checkbox"/> Hazardous/Liquid Waste Management		
<input type="checkbox"/> Sanitary Waste Management		
<input type="checkbox"/> Material Use, Delivery and Storage		
<input type="checkbox"/> Concrete Waste Management		
<input type="checkbox"/> Spill Prevention and Control		
<input type="checkbox"/> Contaminated Soil Management		

City of San Diego

Consultant BMP Inspection Training

Scope of Work

Training Objectives:

At the conclusion of this training, the participant will:

- *Understand the environmental requirements, policies, and laws that pertain to City of San Diego Construction activities*
- *Know how to evaluate a project site and identify environmental issues adjacent to the project site*
- *Know the purpose for proper implementation of BMPs*
- *Know how to Identify Correct vs. Incorrect BMP Installations and Maintenance*
- *Know how to document and complete a BMP Inspection Form*

2-3 4-hour Classroom Sessions – Covering 1-4c

4-5 4-hour On-site Sessions – Covering 4d

1. General EPA/Permit Information and Review (15 minutes)

- a. Clean Water Act
- b. MS4/NPDES Permit
- c. Municipal Code and Storm Water Standards Manual

2. Plan Review and Inspection Requirements (30 minutes)

- a. Understanding a SWPPP/WPCP and the Drawings/Plans (use real examples)
- b. Critical Inspector Requirements
 - i. Understanding Risk Levels vs. Priority
 - ii. Communication and Recognizing limitations (Means and Methods)

3. Best Management Practices (60 minutes w/quiz)

- a. Understanding the Phases of Construction
- b. Understanding and Inspecting BMPs (include quizzes)
 - i. Erosion control practices
 - ii. Sediment controls
 - iii. Protection of Drains and inlets
 - iv. Run-on & Run-off structures/methods
 - v. Wind/Dust control methods
 - vi. Good Housekeeping and Materials/Equipment Management
- c. Writing Inspection Notices and photo documentation

BREAK (15 minutes)

4. Conducting Inspections (60 minutes w/ quiz)

- a. Inspection Requirements
 - i. Role of Designers, Inspectors, and Contractors

City of San Diego
Consultant BMP Inspection Training

- ii. Inspection Frequency: Minimum Required for CGP and MS4
- b. Inspector Responsibilities During Construction Activities
 - i. Inspection Notices
 - ii. Reporting on BMP Maintenance
 - iii. Documentation and Communication w/ QCP/QSP
 - iv. Working with Contractors and Clients

QUESTION SESSION (20 MINUTES)

- c. Review above information (30 minutes w/ quiz)
-

- d. Inspecting a Construction Site (4 hours, residential & commercial site visit)
 - i. Preparation prior to Inspection: reviewing SWPPP/WPCP & site maps
 - ii. Evaluating the site: Where are discharge points? Where is the nearest water body? Where are storm drain inlets?
 - iii. Reviewing the proposed schedule of work
 - iv. BMP Installation Methods
 - v. BMP Maintenance Methods
 - vi. BMP Combinations to look for

City of San Diego

Consultant BMP Inspection Training

Minimum Required Qualifications

- Listed as a Trainer of Record (TOR) per CASQA
https://www.casqa.org/sites/default/files/downloads/list_tors_7-1-14.pdf
- 5-years experience in construction management and storm water pollution prevention compliance
 - 5-years experience in Stormwater Pollution Prevention Plan (SWPPP) Development
 - 5-years experience in Project Risk Assessments
 - 5-years experience in Compliance Inspections and Reporting
 - 5-years experience in Rain Event Inspections and Sampling
- 5-years experience in managing California storm water programs for Caltrans, cities, counties, public utilities, or universities
- Extensive knowledge of the Construction component of the San Diego Municipal Permit
- Experience in implementing requirements of the City of Diego Storm Water Standards Manual

Bonus qualifications

- Current or previous member of the State Water Resources Control Board's Construction General Permit Training Team
- Experience as a Lead Trainer for Caltrans

Proposal Basis

- The training topics will be discussed and modifications shall be approved by the City.
- Trainer to conduct sessions by March 1, 2015.
- Training material or handouts to be provided by the trainer w/ prior approval by the City
- Classroom Sessions: The City will arrange a venue for the training and prepare set up, including projector, screen, lap top, etc.
- Off-Site Sessions: The City will make every attempt to locate suitable CIP Projects and/or private sites. In the event that the City is unable to locate sites, trainer shall locate other sites and take into consideration liability risks and the need for waivers for attendees. Anticipate sessions in the rain.
- The City will prepare training announcement and register students
- Anticipated attendees are approximately 150 students.
- Semi-professional video taping of each session will be conducted by the City.
- Consultant to provide cost per session type. City reserves the right to cancel the second session if not needed.



Proposed Escalating Enforcement Approach

Level and Type of Violation	Notice and Penalty
<input type="checkbox"/> Level 1. Deficiency/Correction Violation <ul style="list-style-type: none"> ▪ Issued if evidence of potential to pollute ▪ For maintenance of BMPs and/or for Insufficient/Inadequate BMPs ▪ Requires immediate correction 	<input type="checkbox"/> Level 1. Notice of Deficiency/Correction <ul style="list-style-type: none"> ▪ Issue BMP Notice ▪ CIPs - address at progress meetings w/ Prime
<input type="checkbox"/> Level 2. Violation <ul style="list-style-type: none"> ▪ Issued if evidence/observation of active discharge from site ▪ Issued if lack of minimum BMPs ▪ Issued for repeat instances of a Level 1 (continued non-compliance) ▪ Requires immediate correction 	<input type="checkbox"/> Level 2. Notice of Violation <ul style="list-style-type: none"> ▪ Issue Administrative Citation ▪ \$500-\$1000 per day per violation ▪ CIPs – In addition to Citation, Schedule meeting w/ Prime Contractor ▪ 10-day appeal period
<input type="checkbox"/> Level 3. Gross Violation <ul style="list-style-type: none"> ▪ Issued if Level 1 or 2 for non-compliance is observed at re-inspection ▪ Issued if active discharge enters MS4 ▪ Requires immediate correction ▪ Notification and referral to RWQCB 	<input type="checkbox"/> Level 3. NOV w/ Administrative Civil Penalty <ul style="list-style-type: none"> ▪ Issue Stop Work Warning Letter ▪ Administrative Civil Penalties of \$1000-\$10,000 per day per violation, appealable to Hearing ▪ Initiates City Attorney Notification and review ▪ CIPs – In addition to Civil Penalty, Meeting w/ contractor for breach of contract and potential Notice of Default (5 working days to cure per Greenbook)
<input type="checkbox"/> Level 4. Stop Work Notice <ul style="list-style-type: none"> ▪ Issued for Level 3 non-compliance at re-inspection ▪ Requires immediate correction ▪ Notification and referral to RWQCB 	<input type="checkbox"/> Level 4. Stop Work Notice (Civil Action) <ul style="list-style-type: none"> ▪ Requires City Attorney review of letter ▪ Provide all documentation to RWQCB ▪ CIPs – Meeting w/ contractor for breach of contract and potential Notice of Default (5 working days to cure per GB)



Proposed Escalating Enforcement Approach	
Level and Type of Violation	Notice and Penalty
<ul style="list-style-type: none"> <input type="checkbox"/> Level 1. Deficiency/Correction Violation <ul style="list-style-type: none"> ▪ Issued if evidence of potential to pollute ▪ For maintenance of BMPs and/or for Insufficient/Inadequate BMPs ▪ Requires immediate correction 	<ul style="list-style-type: none"> <input type="checkbox"/> Level 1. Notice of Deficiency/Correction <ul style="list-style-type: none"> ▪ Issue DS-3
<ul style="list-style-type: none"> <input type="checkbox"/> Level 2. Violation <ul style="list-style-type: none"> ▪ Issued if evidence/observation of active discharge ▪ Issued if lack of minimum BMPs ▪ Issued if repeat instances of a Level 1 (continued non-compliance) ▪ Requires immediate correction 	<ul style="list-style-type: none"> <input type="checkbox"/> Level 2. Notice of Violation <ul style="list-style-type: none"> ▪ Issue DS-3 ▪ Fail all scheduled inspections ▪ Issue re-inspection fees ▪ Place Tier 1 hold to not allow any inspections until corrections have been made
<ul style="list-style-type: none"> <input type="checkbox"/> Level 3. Gross Violation <ul style="list-style-type: none"> ▪ Issued if Level 1 or 2 for non-compliance is observed at re-inspection ▪ Issued if active discharge enters MS4 ▪ Requires immediate correction ▪ Notification and referral to RWQCB 	<ul style="list-style-type: none"> <input type="checkbox"/> Level 3. Administrative Citation <ul style="list-style-type: none"> ▪ Issue Stop Work Warning Letter ▪ Administrative Citations up to \$1,000 per day per violation ▪ Initiates City Attorney Notification and review
<ul style="list-style-type: none"> <input type="checkbox"/> Level 4. Stop Work Notice (Legal Action) <ul style="list-style-type: none"> ▪ Issued for Level 3 non-compliance at re-inspection ▪ Notification and referral to RWQCB 	<ul style="list-style-type: none"> <input type="checkbox"/> Level 4. Stop Work Notice <ul style="list-style-type: none"> ▪ Requires City Attorney review of letter ▪ Administrative Citations up to \$1,000 per violation per day ▪ Provide all documentation to RWQCB ▪ Civil Penalties up to \$10,000 per day per violation up to \$100,000 for continued non-compliant sites

Before



After



Before



After



